

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

INDICTMENT

v.

Case No.

22 CR 114
18 U.S.C. § 2251(a)
18 U.S.C. § 2253

MATTHEW E. QUAGLIERI,

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

On or about September 22, 2022, in the Western District of Wisconsin, the defendant,

MATTHEW E. QUAGLIERI,

knowingly and intentionally used a minor, Minor 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, an Apple iPad.

(In violation of Title 18, United States Code, Section 2251(a)).

COUNT 2

On or about September 23, 2022, in the Western District of Wisconsin, the defendant,

MATTHEW E. QUAGLIERI,

knowingly and intentionally used a minor, Minor 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, an Apple iPad.

(In violation of Title 18, United States Code, Section 2251(a)).

FILED/REC'D

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CLERK OF COURT
U.S. DISTRICT COURT
WD OF WI

COUNT 3

On or about September 29, 2022, in the Western District of Wisconsin, the defendant,

MATTHEW E. QUAGLIERI,

knowingly and intentionally used a minor, Minor 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, an Apple iPad.

(In violation of Title 18, United States Code, Section 2251(a)).

FORFEITURE ALLEGATION

As a result of the offenses charged in Counts 1-3 of this indictment, and upon conviction for violating Title 18, United States Code, Section 2251(a), pursuant to Title 18, United States Code, Section 2253, the defendant,

MATTHEW E. QUAGLIERI,

shall forfeit to the United States his right, title, and interest in:

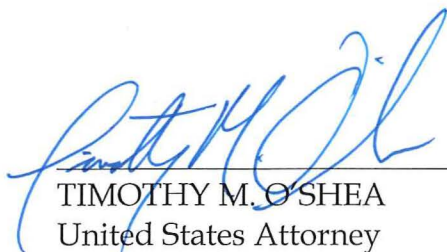
- (1) Any and all visual depictions which contain images which are or appear to be child pornography, together with the storage media in which they are contained, and
- (2) any and all property used or intended to be used to commit or to promote the commission of the aforementioned offense, including property specifically described as an Apple iPad.

A TRUE BILL



PRESIDING JUROR

Indictment returned: 10-12-2022



TIMOTHY M. O'SHEA
United States Attorney